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### NOTES OF CASES.

**Conspiracy to Violate the White Slave Act.**—An important decision involving the Mann Act was handed down by the United States Supreme Court February 1, reported in 35 Supreme Court Reporter 271, under the title *United States v. Clara Holte*. Defendant was indicted for conspiring with one Laudenschleger to cause herself to be transported from one state to another for the purpose of prostitution. The District Court sustained a demurrer on the theory that, as defendant was the victim, she could not also be a party to the conspiracy. On writ of error at the instance of the government, the decision below is reversed in an opinion by Justice Holmes in part as follows: "We do not have to consider what would be necessary to constitute the substantive crime under the act of 1910, or what evidence would be required to convict a woman under an indictment like this, but only to decide whether it is impossible for the transported woman to be guilty of a crime in conspiring as alleged. \* \* \* We think that it would be going too far to say that the defendant could not be guilty in this case. Suppose, for instance, that a professional prostitute, as well able to look out for herself as was the man, should suggest and carry out a journey within the act of 1910 in the hope of blackmailing the man, and should buy the railroad tickets, or should pay the fare from Jersey City to New York, she would be within the letter of the act of 1910, and we see no reason why the act should not be held to apply. We see equally little reason for not treating the preliminary agreement as a conspiracy that the law can reach, if we abandon the illusion that the woman always is the victim." Justice Lamar filed a vigorous dissenting opinion, in which Justice Day concurred, setting forth that the effect of the majority opinion would be to seal the lips of the woman as a witness in prosecution of the procurer for the reason that her testimony might tend to convict her of conspiracy to violate the act.

**Champerty and Maintenance—Soliciting Business—Advancing Money.**—It is not against public policy as champerty or maintenance, for an attorney to solicit business, or to advance money to a poor client for his living expenses during litigation, or to advise a client against the settlement of his case. *Johnson v. Great Northern Ry. Co.* 151 N. W. 125.

**Habeas Corpus—Enlistment of Minor—Discharge on Application of Parent.**—After service of a writ of habeas corpus sued out by the relator to recover the custody of her minor son who had enlisted in the army, falsely stating that he was of age, he was arrested and held for trial by court martial on a charge of fraudulent enlistment. Held, the enlistment was binding upon the minor, and his parent or guardian can not recover custody of him till he has answered for